



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2023 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

RYAN PAUL LEVIHN-COON,

Defendant.

CR No. 2:23-cr-00629-JAK

I N D I C T M E N T

[18 U.S.C. § 1344(2): Bank Fraud;
18 U.S.C. § 1028A(a)(1):
Aggravated Identity Theft;
18 U.S.C. § 1705: Breaking Open
and Injuring Mail Receptacles;
18 U.S.C. § 1708: Mail Theft]

The Grand Jury charges:

COUNTS ONE THROUGH FIVE

[18 U.S.C. § 1344(2)]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

1. Partners Federal Credit Union was a financial institution insured by the National Credit Union Administration.

2. Wells Fargo, N.A., Citibank, N.A., Banc of California, Partners Federal Credit Union, Citizens Bureau Bank, and JP Morgan Chase Bank ("Chase") (collectively with Partners Federal Credit

1 Union, the "Financial Institutions") were financial institutions
2 insured by the Federal Deposit Insurance Corporation.

3 3. Defendant RYAN PAUL LEVIHN-COON operated and controlled the
4 following two accounts in his name at Fidelity Investments, a
5 financial services corporation based in Boston, Massachusetts: (1) a
6 cash management account ending in -0191; and (2) a brokerage services
7 account ending in -8229 (collectively, the "Fidelity Accounts").

8 B. THE SCHEME TO DEFRAUD

9 4. Beginning on a date unknown to the Grand Jury, but no later
10 than on or about April 13, 2022, and continuing through at least on
11 or about October 17, 2022, in Los Angeles County, within the Central
12 District of California, and elsewhere, defendant LEVIHN-COON,
13 knowingly and with intent to defraud, executed a scheme to obtain
14 monies, funds, assets, and other property owned by and under the
15 custody and control of the Financial Institutions by means of
16 materially false and fraudulent pretenses, representations, and
17 promises, and the concealment of material facts.

18 5. The fraudulent scheme operated and was carried out, in
19 substance, in the following manner:

20 a. Defendant LEVIHN-COON would break into the community
21 mailboxes in the mailroom of the Tesoro del Valle Apartments located
22 at 2301 Humboldt Street in Los Angeles, California.

23 b. Defendant LEVIHN-COON would steal mail belonging to
24 residents of the Tesoro del Valle Apartments from the community
25 mailboxes.

26 c. When defendant LEVIHN-COON found a check in the stolen
27 mail, defendant LEVIHN-COON would, without authorization, endorse the
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1 check to be paid to defendant LEVIHN-COON and forge the signature of
2 the check's intended recipient.

3 d. Defendant LEVIHN-COON would deposit the stolen and
4 modified checks, drawn from the Financial Institutions, into
5 defendant LEVIHN-COON's Fidelity Accounts. In doing so, defendant
6 LEVIHN-COON falsely represented to the Financial Institutions that he
7 was an authorized payee of the check and had authority to deposit the
8 checks and concealed from the Financial Institutions that defendant
9 LEVIHN-COON was not the intended payee and did not have authority to
10 possess and deposit the checks.

11 e. Defendant LEVIHN-COON would spend the fraudulently
12 obtained funds deposited in defendant LEVIHN-COON's Fidelity Accounts
13 by making purchases using a Fidelity debit card.

14 C. EXECUTIONS OF THE FRAUDULENT SCHEME

15 6. On or about the following dates, in Los Angeles County,
16 within the Central District of California, and elsewhere, defendant
17 LEVIHN-COON committed the following acts, each of which constituted
18 an execution of the fraudulent scheme:

| COUNT | DATE | ACT |
|-------|----------------|--|
| ONE | April 13, 2022 | Deposit of a stolen and altered check issued to R.I.G. in the amount of \$165.71 into defendant LEVIHN-COON's Fidelity account ending in 8229. |
| TWO | July 19, 2022 | Deposit of a stolen and altered check issued to E.Q. in the amount of \$197.34 into defendant LEVIHN-COON's Fidelity account ending in 0191. |
| THREE | July 21, 2022 | Deposit of a stolen and altered check issued to M.C. in the amount of \$350.00 into defendant LEVIHN-COON's Fidelity account ending in 0191. |

| COUNT | DATE | ACT |
|-------|------------------|--|
| FOUR | August 21, 2022 | Deposit of a stolen and altered check issued to C.B. in the amount of \$150.00 into defendant LEVIHN-COON's Fidelity account ending in 0191. |
| FIVE | October 17, 2022 | Deposit of a stolen and altered check issued to C.G. in the amount of \$2,270.74 into defendant LEVIHN-COON's Fidelity account ending in 8229. |

COUNT SIX

[18 U.S.C. § 1028A(a)(1)]

On or about October 17, 2022, in Los Angeles County, within the Central District of California, defendant RYAN PAUL LEVIHN-COON knowingly possessed and used, without lawful authority, a means of identification that defendant LEVIHN-COON knew belonged to another person, namely, the name of victim C.G., during and in relation to the offense of Bank Fraud, a felony violation of Title 18, United States Code, Section 1344(2), as charged in Count Five of this Indictment.

COUNTS SEVEN AND EIGHT

[18 U.S.C. § 1705]

On or about the following dates, in Los Angeles County, within the Central District of California, defendant RYAN PAUL LEVIHN-COON willfully and maliciously injured and broke open authorized mail receptacles, namely, community mailboxes located at the Tesoro de Valle Apartments at 2301 Humboldt Street in Los Angeles, California, which were intended and used for the receipt and delivery of mail matter on a route of the United States Postal Service:

| COUNT | DATE |
|-------|-----------------|
| SEVEN | August 19, 2022 |
| EIGHT | August 20, 2022 |

COUNTS NINE AND TEN

[18 U.S.C. § 1708]

On or about the following dates, in Los Angeles County, within the Central District of California, defendant RYAN PAUL LEVIHN-COON stole, took, and abstracted mail and mail matter from and out of a letter box, mail receptacle, mail route, and authorized depository for mail matter, namely, community mailboxes located at the Tesoro del Valle Apartments at 2301 Humboldt Street in Los Angeles,

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California, with the intent to deprive the owners of the mail and mail matter, temporarily and permanently, of its use and benefit:

| COUNT | DATE | MAIL RECEPTACLE LOCATION |
|-------|-----------------|--|
| NINE | August 19, 2022 | Tesoro del Valle Apartments, 2301 Humboldt Street, Los Angeles, California 90031 |
| TEN | August 20, 2022 | Tesoro del Valle Apartments, 2301 Humboldt Street, Los Angeles, California 90031 |

A TRUE BILL

/s/
Foreperson

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